

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

FILED UNDER SEAL

IN THE MATTER OF THE SEARCH OF:

**535 Rough Creek Road, Pamplin, Virginia
to include the curtilage and all outbuildings
on the premises**

Case No. 6:22MJ00029

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A WARRANT TO SEARCH AND SEIZE**

I, Daniel Bailey, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the premises, to include the curtilage and all outbuildings, of 535 Rough Creek Road, Pamplin, Virginia (TARGET ADDRESS), further described in Attachment A, for the things described in Attachment B.

2. I am an investigator or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and make arrest for, the offenses enumerated in Titles 18, 19, 21, and 31 of the United States Code and other related offenses, since 2017.

3. I am a Task Force Officer with the Drug Enforcement Administration (DEA) and have been since 2017. I am also a Detective with the Lynchburg Police Department (Virginia) and been so employed since 2002. I am currently assigned to investigate drug trafficking organizations as a member of the DEA, Washington Field Division/Roanoke Resident Office. My duties as a Task Force Officer involve the investigation of various criminal activities of

narcotics traffickers and their associates. In investigating these matters, I have acted as a case agent, an undercover agent, and a contact agent for confidential sources. These investigations have resulted in the issuance of federal search warrants, seizure warrants, indictments, and convictions of persons for federal narcotics violations. During my employment as a law enforcement officer, I have received multiple hours of training in narcotics enforcement and investigative techniques, and I have personally participated in numerous investigations. I have also spoken on numerous occasions with informants, suspects, and other experienced narcotics traffickers concerning the methods and practices of drug traffickers, including the methods and practices used by traffickers of methamphetamine, heroin, and cocaine. I have been involved in the execution of numerous search warrants on electronic devices, including cellphones, and in obtaining location information for those devices.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that the TARGET ADDRESS contains evidence violations of possession of a firearm by a prohibited person, in violation of 18 U.S.C. § 922(g). There is probable cause to search the locations described in Attachment A for evidence, contraband, and/or fruits of these crimes further described in Attachment B.

PROBABLE CAUSE

6. On November 16, 2022, the United States Marshals Service arrived at the TARGET ADDRESS to serve an arrest warrant on Jessica COLLINS (“COLLINS”). COLLINS

had been indicted by a grand jury in the Western District of Virginia on November 9, 2022 for conspiracy to distribute methamphetamine and distribution of methamphetamine.

7. Law enforcement had reason to believe COLLINS resided at the TARGET ADDRESS based on public information. The TARGET ADDRESS is located in Appomattox County, within the Western District of Virginia.

8. Upon arriving at the TARGET ADDRESS, law enforcement noticed that the door was ajar. Law enforcement opened the door and announced their presence. Law enforcement observed two rifles in plain view in the common area.

9. COLLINS appeared from another room and was taken into custody at that time.

10. For safety purposes, law enforcement asked if anyone else was in TARGET ADDRESS. COLLINS stated her significant other was present.

11. For safety purposes, law enforcement asked if there were any firearms in the residence. COLLINS stated her significant other may have one in his room, indicating they slept in different rooms.

12. Law enforcement attempted to contact the significant other, who would did not initially come out. The significant other did eventually come out and was identified as Chester Peron Laughlin Jr.

13. Law enforcement asked Laughlin if there were any firearms in the house. Laughlin did not think there were, but indicated there may be some that belong to his daughter.

14. A criminal records check for COLLINS indicates that she was convicted of felony distribution of marijuana on or about August 3, 2001 in Madison County, Georgia, for which she received a sentence of five years of probation. Further, on or about November 5, 2003,

COLLINS was convicted of felony theft by receiving stolen property in Madison County, Georgia.

15. A criminal records check for Laughlin indicates he was convicted of felony possession of a firearm or knife during the commission of a felony, on or about March 20, 2002 in Georgia. Laughlin was further convicted of felony receiving stolen property, on or about November 5, 2003, in Georgia.

16. Based on the foregoing, there is probable cause to search the TARGET ADDRESS for evidence of felon in possession of a firearm, in violation of 18 U.S.C. § 922(g), and to seize such evidence.

CONCLUSION

17. I submit that this affidavit supports probable cause for a search warrant authorizing the examination of the devices described in Attachment A, in order to seek the items described in Attachment B.

OATH

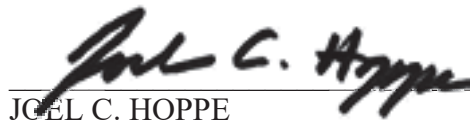
I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

s/Daniel Bailey

Daniel Bailey, Task Force Officer
Drug Enforcement Administration

Received by reliable electronic means and sworn and attested to by telephone on this 16th day of November 2022.


JOEL C. HOPPE
UNITED STATES MAGISTRATE JUDGE